

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 23-
v.	:	DATE FILED: May 11, 2023
ITEZ TINSLEY	:	VIOLATIONS:
		18 U.S.C. § 2119 (carjacking – 1 count)
		: 18 U.S.C. § 924(c)(1)(A)(ii) (using, carrying,
		and brandishing a firearm during and in
		: relation to a crime of violence – 1 count)
		18 U.S.C. § 2 (aiding and abetting)
		: Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 18, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ITEZ TINSLEY,

and others unknown to the grand jury, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of A.T., a person known to the grand jury, by force and violence, and by intimidation, a motor vehicle, that is, a 2007 Honda Accord, VIN 1HGCM66507A094295, license plate PA LRA7650, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 18, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ITEZ TINSLEY

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, carjacking, and aiding and abetting, in violation of Title 18, United States Code, Sections 2119 and 2, as charged in Count One of this indictment, and that firearm was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2119 and 924(c)(1)(A), set forth in this indictment, defendant

ITEZ TINSELY

shall forfeit to the United States of America:

- (a) all firearms and ammunition involved in the commission of the violations of Title 18, United States Code, Sections 2119 and 924(c)(1)(A); and
- (b) all property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of the violation of Title 18, United States Code, Section 2119.

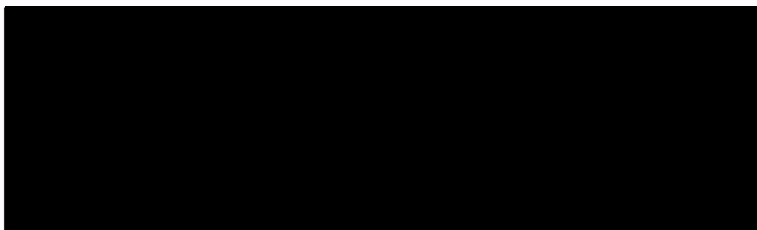
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 924(d) and 982(a)(5).

A TRUE BILL:



A handwritten signature in cursive script, appearing to read "JCR /for".

JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ITEZ TINSLEY

INDICTMENT

Counts

18 U.S.C. § 2119

(carjacking – 1 count)

18 U.S.C. § 924(c)(1)(A)

(using, carrying, and brandishing a firearm during and in relation to a crime of violence – 1 count)

18 U.S.C. § 2

(aiding and abetting)

Notice of forfeiture



Foreman

Filed in open court this 11th day,
of May A.D. 2023

Clerk

Bail, \$ _____
